

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 14-00029-01/19-CR-W-GAF

FRENKLYN PIGGIE,

Defendant.

**MOTION FOR EXTENSION OF TIME TO FILE REPLY TO GOVERNMENT’S
RESPONSE IN OPPOSITION TO DEFENDANT’S PRO SE MOTION TO REDUCE
SENTENCE PURSUANT TO 18 U.S.C. § 3582(c)(1)(A)(i) – COMPASSIONATE
RELEASE**

COMES Defendant, Frenklyn Piggie (“Piggie”), appearing *pro se*, and files his Motion for Extension of Time to File Reply to Government’s Response in Opposition to Defendant’s *Pro Se* Motion to Reduce Sentence Pursuant to 18 U.S.C. § 3582(c)(1)(A)(i) – Compassionate Release (“GO”), and would show as follows:

I. Preliminary Statement

As a preliminary matter, Piggie respectfully requests that the Court be mindful that “a *pro se* complaint should be given liberal construction, we mean that if the essence of an allegation is discernible ... then the district court should construe the complaint in a way that permits the layperson’s claim to be considered within the proper legal framework.” See *Solomon v. Petray*, 795 F.3d 777, 787 (8th Cir. 2015); *Estelle v. Gamble*, 429 U.S. 97 (1976) (same); and *Haines v. Kerner*, 404 U.S. 519 (1972) (same).

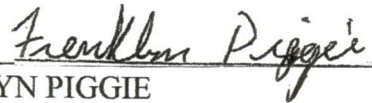
II. Reason for Extension of Time to File Reply

Piggie has just become aware of the GO from an source outside of the prison that was filed by the government on May 17, 2021. He has not received a copy of same in the prison mail as of this date. However, his source informs him that the GO is twenty-three (23) in length. As such, he seeks approximately forty-five (45) day extension of time, up to and including, July 5, 2021, in which to file his Reply. This is because he does not know when he will receive the GO in the prison mail and because there has been limited access to the law library because of the pandemic.

WHEREFORE, premises considered, Piggie prays that the Court grant a 45-day extension of time in which to file his Reply to the GO, up to and including July 5, 2021.

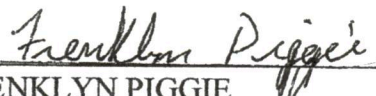
Respectfully submitted,

Dated: May 20, 2021.


FRENKLYN PIGGIE
REG. NO. 13137-045
FCI COLEMAN LOW
FEDERAL CORR. INSTITUTION
P.O. BOX 1031
COLEMAN, FL 33521

CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2021, a true and correct copy of the above and foregoing Motion for Extension of Time to File Reply to Government's Response in Opposition to Defendant's Pro Se Motion for Compassionate Release/Reduction in Sentence Pursuant to 18 U.S.C. § 3582(c)(1)(A) and the First Step Act of 2018 was sent via U. S. Mail, postage prepaid, Brent Venneman, Assistant U.S. Attorney at U.S. Attorney's Office - KCMO, 400 E 9th Street, Suite 5510, Kansas City, MO 64106.


FRENKLYN PIGGIE

FRENKLYN PIGGIE
REG. NO. 13137-045
FCI COLEMAN LOW
FEDERAL CORR. INSTITUTION
P.O. BOX 1031
COLEMAN, FL 33521

May 20, 2021

Clerk, U. S. District Court
Western District of Missouri
Western Division - Kansas City
400 East Ninth Street
Kansas City, MO 64106

RE: *Piggie v. United States*
Crim No. 4:14-cr-00029-GAF-1

To the Clerk of the Court:

Enclosed please find and accept for filing Defendant's Motion for Extension of Time to File Reply to Government's Response in Opposition to Defendant's *Pro Se* Motion to Reduce Sentence Pursuant to 18 U.S.C. § 3582(c)(1)(A)(i) – Compassionate Release . Please submit this document to the Court.

Thank you for your assistance in this matter.

Sincerely,



FRENKLYN PIGGIE
Appearing *Pro Se*

Encl. as noted